

2

1 Mark A. Serlin, CSBN: 122155  
2 SERLIN & WHITEFORD, LLP  
3 700 E Street  
4 Sacramento, CA 95814  
5 Telephone: (916) 446-0790  
6 Facsimile: (916) 446-0791  
7 Email: [mserlin@globelaw.com](mailto:mserlin@globelaw.com)

8 Attorneys for Creditor  
9 AG-SEEDS UNLIMITED

10 UNITED STATES BANKRUPTCY COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12 (SACRAMENTO DIVISION)

13 In re:	)	CASE NO. 15-29136
	)	Chapter 12
14 P&M SAMRA LAND	)	
15 INVESTMENTS, LLC,	)	DCN: MAS-10
	)	
16 Debtor.	)	<b>NOTICE OF HEARING ON MOTION TO</b>
	)	<b>DISMISS CASE BASED ON DEFAULT</b>
	)	<b>UNDER CONFIRMED PLAN</b>
	)	
	)	Date: February 5, 2018
	)	Time: 10:00 a.m.
	)	Dept: A

---

18  
19 TO THE DEBTOR, THE CHAPTER 12 TRUSTEE, U.S. TRUSTEE, AND OTHER  
20 PARTIES IN INTEREST:

21 PLEASE TAKE NOTICE that on February 5, 2018 at 10:00 a.m. of Department A,  
22 Courtroom 28 of the United States Bankruptcy Court for the Eastern District of California located  
23 at 501 I Street, 7<sup>th</sup> Floor, Sacramento, California 95814, a hearing will be held on the motion of  
24 creditor Ag-Seeds Unlimited for dismissal of the within Chapter 12 case based on a default under  
25 the confirmed Chapter 12 plan. The motion will be based on the instant notice of hearing, the  
26 motion itself, the declaration of Mark A. Serlin in support of such motion, and such other and  
27 further matters that may be susceptible to judicial notice.

28 ///

1 Opposition, if any, to the granting of the motion shall be in writing and shall be served and  
2 filed with the Court by the responding party at least fourteen (14) calendar days preceding the date  
3 or continued date of the hearing. Opposition shall be accompanied by evidence establishing its  
4 factual allegations. Without good cause, no party shall be heard in opposition to a motion at oral  
5 argument if written opposition to the motion has not been timely filed. Failure of the responding  
6 party to timely file written opposition may be deemed a waiver of any opposition to the granting of  
7 the motion or may result in the imposition of sanctions.

8 Not all information contained in the motion is set forth in this notice. Copies of the  
9 moving papers are available from the Clerk of the Bankruptcy Court located at 501 I Street, 3<sup>rd</sup>  
10 Floor, Sacramento, California 95814 or upon written request to the undersigned counsel at the  
11 address listed at the top of this notice.

12 DATED: December 29, 2017

SERLIN & WHITEFORD, LLP

13  
14 By: /s/ Mark A. Serlin  
15 MARK A. SERLIN, Attorneys for Creditor  
16 AG-SEEDS UNLIMITED  
17  
18  
19  
20  
21  
22  
23  
24

25 S:\Active Files\AG-SEEDS\STEVE SAMRA FARMS\CONSPIRACY CASE\BK\court docs\default dismiss.notice.docx  
26  
27  
28